

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

<b>ERIC L. JEFFRIES,</b>	)	<b>CASE NO. C-1-02-351</b>
	:	
<b>Plaintiff,</b>	)	<b>JUDGE BECKWITH</b>
	:	<b>MAGISTRATE JUDGE HOGAN</b>
<b>v.</b>	)	
	:	
<b>CENTRE LIFE INSURANCE CO., et. al.,)</b>	)	
	:	
<b>Defendants.</b>	)	

**AFFIDAVIT OF  
ANDREW COHEN**

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ANDREW COHEN, being duly sworn, deposes and says:

1. I am General Counsel and Secretary of Disability Management Services, Inc. (“DMS”).
2. As of February 1999, Massachusetts Casualty Insurance Company, now known as Centre Life Insurance Company (“CLIC”) engaged DMS to administer CLIC disability products, including claims management, underwriting, policyholder services and other functions.
3. From 1999 to present, there were a total of nine (9) lawsuits initiated by CLIC disability income policyholders from states comprising the 6<sup>th</sup> federal circuit, out of a total of 1,036 claims submitted for that same time period.
4. I have reviewed judgments and settlements concerning litigated disability income claims venued in the 6<sup>th</sup> federal circuit where the defendant(s) in those cases were

either CLIC or DMS from 1999 to the present.

5. There were no judgments for "bad faith".
6. There were no settlements in excess of, at, or even close to the present value of the policy at issue.



ANDREW COHEN

Sworn to and subscribed before me

this 3<sup>rd</sup> day of October 2003.



PAMELA CULPEPPER  
NOTARY PUBLIC